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UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF MISSOURI
DIVISION

Complaint for a Civil Case

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

v. Karen S. Jones

Case No.

(to be assigned by Clerk of District Court)

Plaintiff requests trial by jury:

☒ Yes ☐ No

demand jury trial

(Write the full name of each defendant. The caption must include the names of all of the parties. Fed. R. Civ. P. 10(a). Merely listing one party and writing "et al." is insufficient. Attach additional sheets if necessary.)

Regina Wells

Stange Law Firm, PC

CIVIL COMPLAINT

NOTICE:

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date, the full name of a person known to be a minor, or a complete financial account number. A filing may include only: the last four digits of a social security number, the year of an individual's birth, a minor's initials, and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the \$400.00 filing fee or an application to proceed without prepaying fees or costs.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Karen S. Jones</u>
Street Address	<u>P.O. Box 4823</u>
City and County	<u>St. Louis, MO</u>
State and Zip Code	<u>MO 63108</u>
Telephone Number	<u>314-229-3153</u>
E-mail Address	<u>kspecial1255@gmail.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>^{L.L.} Regina Wells; Stange Law Firm PC</u>
Job or Title	<u>Partner/attorney</u>
Street Address	<u>120 S. Central Ave. Ste 450</u>
City and County	<u>Clayton, MO</u>
State and Zip Code	<u>MO 63105 (314)</u>
Telephone Number	<u>314-963-4700; 963-9191</u>
E-mail Address	<u></u>

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant. If you are suing for violation of your civil rights, you must state whether you are suing each defendant in an official capacity, individual capacity, or both.)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only three types of cases can be heard in federal court. Provide the information for this case. (Include all information that applies to your case)

A. Federal question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Title 42 U.S.C. Sect 1983
 Civil Rights 1964
 Article III Section 2
 Color of Law 18 U.S.C. 242
 Supreme Court Rule 4
 United States Constitution
 14th Amendment - Due Process
 5th Amendment - Due Process
 Equal Protection (1)
 Notice of Hearing

B. Suit against the Federal Government, a federal official, or federal agency

List the federal officials or federal agencies involved, if any. N/A

C. Diversity of Citizenship N/A

These are cases in which a citizen of one State sues a citizen of another State or nation, and the amount at stake is more than \$75,000. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

1. The Plaintiff(s)

The plaintiff, (name) _____, is a citizen of the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

If the defendant is an individual

The defendant, (name) Regina L.L. Wells / Stange Law Firm, is a citizen
of the State of (name) Missouri Or is a citizen
of (foreign nation) _____.

If the defendant is a corporation

The defendant, (name) _____
is incorporated under the laws of the State of (name) _____
_____, and has its principal place of
business in the State of (name) _____ Or
is incorporated under the laws of the State of (foreign nation) _____
_____, and has its principal place
of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy N/A

The amount in controversy----the amount the plaintiff(s) claims the defendant(s) owes or the amount at stake----is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Type, or neatly print, a short and plain statement of the **FACTS** that support your claim(s). For every defendant you have named in this complaint, you must state what he or she personally did to harm you. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Do not make legal arguments, or cite court cases or statutes. You may attach additional pages if necessary.

Your statement of claim must include all of the following information:

1. What happened to you?
2. When did it happen?
3. Where did it happen?
4. What injuries did you suffer?
5. What did each defendant personally do, or fail to do, to harm you?

" See attached "

IV. Relief

State briefly and precisely what damages or other relief you want from the Court. Do not make legal arguments.

Relief order MO Court of Appeals to
Send case to Judge Chinner juvenile court
for transfer custody to resolve ^{any} issues.
Order restitution, Due Process, Fees,
Order Payment back compensatory Punitive and

CIVIL COMPLAINT ANSWERS TO PG 5

ISSUE: WHETHER AN ATTORNEY CAN BE HELD LIABLE FOR LEGAL MALPRACTICE FOR FAILURE TO FILE A TIMELY (SPECIFIC) BRIEF FOR AN ADOPTION APPEAL BECAUSE OF THEIR OWN PERSONAL REASONS, UNACCEPTABLE EXCUSES, AND UNPROFESSIONALISM THAT VIOLATED THE CODE OF ETHICS AND JUDICIAL CONDUCT TO THEIR CLIENT WHICH WASN'T COMMUNICATED EFFECTIVELY WITH A MUTUAL AGREEMENT BEFORE TERMINATING THEIR ATTORNEY-CLIENT RELATIONSHIP WHICH CAUSE UNNECESSARY HARM?

ISSUE: CAN AN ATTORNEY REFUSE TO WRITE A BRIEF THAT WAS DUE FOR AN ADOPTION APPEAL WITH DEADLINES BECAUSE OF THEIR OWN PERSONAL REASON(S) WHICH CAUSED HARM TO A CLIENT AFTER THEIR ABRUPT WITHDRAWAL TO ESCAPE THEIR ATTORNEY "DUTY OF CARE"?

1. WHAT HAPPENED TO YOU?

I hired Stange Law Firm LLC attorney Regina L.L. Wells to appeal (specifically) an adoption in case ED107440 because of systematic judicial corruption. This brief she requested an extension had tight deadlines she said she could meet but failed to meet because of conflict of interest and professional misconduct. Ms Wells violated RULES:

4-1.3 DILIGENCE

4-1.3 COMMUNICATION

4-1.7 CONFLICT OF INTEREST

4-8.3 PROFESSIONAL MISCONDUCT

(she stated she reviewed the whole file, next; Refused to use exhibits from my trial hearing that could've pointed out erroneous errors & "abuse of discretion", that could've changed the outcome of my adoption appeal with Missouri Court of Appeals Eastern District).

Rule 4-7.1 prohibits false misleading statements, therefore, her communication regarding not using exhibits I provided her from my trial court was of material facts that affected my legal rights or obligations.

RSMO 562.014 CONSPIRACY Because of conspiracy and willingness to choose negligence over due diligence Ms Wells failed to protect my interest which caused me harm and therefore I need to file a legal malpractice case to resolve my Due Process issues from her carless, unthoughtful, reckless representation.

2. WHEN DID IT HAPPEN? Around November of 2019 or so

St. Louis, MO County/City, Stange Law Firm LLC, Missouri Court of Appeals Eastern District.

3. WHERE DID IT HAPPEN? St Louis County/City, Stange Law Firm LLC, Mo Court Appeals E.D.**4. WHAT INJURIES DID YOU SUFFER?**

I Lost any contact with my only deceased son child because of attorney Wells misconduct and negligence for failure to file a timely brief I was incapable of filing according to Missouri court of

(Cont) Pg 2 of 2 Civil Complaint Answer 5 to Pg 5

appeals eastern district. I suffered emotional distress because it was my last hope that I relied on Ms Wells who said she went to law school, had experience, and could write a brief.

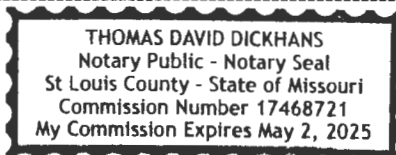
5. WHAT DID EACH DEFENDANT PERSONALLY DO OR FAILED TO DO, OR FAIL TO DO, TO HARM YOU?

- a. Regina Wells—failed to protect my interest, deprived my due process, conspired, neglected to provide due care and diligence to me her client. Told me and her company another lawyer from her firm would not be able to help me either. Via letter, walked out on me and left me emotionally torn and stressed when I relied on her skills to write a timely brief and claimed I would not be harmed later. Refused to write a simple brief or amicus brief because of her own personal vindictive reasons and to protect the opposing parties. Lied and said a 27 gal bin was huge and too heavy that was a professional storage tote filer.
- b. Stange Law Firm LLC—did not assign another attorney ^{at my request} to substitute Ms Wells instead let her block any legal help or representation I was entitled to or could've gotten. Ms Kelly M. Davidzuk was there and several more that was capable. BREACH OF ETHICS.
- c. Failure to write brief specifically for adoption appeal at Missouri court of appeals E.D. that would've reversed and/or remand case. And failed to write brief out of misconduct, for personal reasons, in an attempt to help opposing parties that could've pointed out erroneous errors and abuse of discretion as well as, fraud upon the court.

RELIEF:

Order transfer custody take place because I proved it should; send case back to Judge Ohmer at St Louis City juvenile court for transfer of custody to resolve any issues. Order Missouri court of appeals e.d. to reverse/remand case back to juvenile so that I may get due process of the law now. Order restitution fees, for emotional distress, mental anguish, humiliation, compensatory damages punitive damages \$200k

Karen Jones



Thomas David Dickhans

Do you claim the wrongs alleged in your complaint are continuing to occur now?

Yes ☒ No ☐

Do you claim actual damages for the acts alleged in your complaint?

Yes ☒ No ☐

Do you claim punitive monetary damages?

Yes ☒ No ☐

If you indicated that you claim actual damages or punitive monetary damages, state the amounts claimed and the reasons you claim you are entitled to recover these damages.

\$4200 pymt to Regina L.H. Wells Stange Law Firm PC
\$200 K for negligence breach of fiduciary duty
emotional distress inadequate counsel
humiliation,

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

I declare under penalty of perjury that the foregoing is true and correct.

State of St. Louis

County of Missouri

Date: 12-21-2021

Qamar D Al Hasany
Notary Public

Signed this 21st day of December, 20 21.

Signature of Plaintiff(s) Karen Jones

